



Paul Savill
Senior Vice President
TEL: 720-888-3566
Paul.Savill@Level3.com

VIA ELECTRONIC MAIL

November 30, 2009

Mr. Jonathan Adelstein, Administrator
Rural Utilities Service
United States Department of Agriculture
1400 Independence Ave., SW
Washington, DC 20250

Mr. Lawrence E. Strickling, Assistant Secretary and Administrator
National Telecommunications and Information Administration (NTIA)
U.S. Department of Commerce
1401 Constitution Ave., NW
Washington, DC 20230

Dear Sirs:

Level 3 Communications, LLC ("Level 3") submits the following comments in response to the joint RFI issued on Monday, November 16, 2009 (Docket Number: 0907141137-91375-05; RIN: 0660-ZA28).

Should the agencies modify the two-step review process, and if so, how?

Response: NTIA and RUS should streamline the amount of information required for Step 1. Several components required in Step 1 that are time consuming would make more sense in Step 2 after the Agencies have determined if the proposed project(s) meet the NOFA requirements and statutory aims.

Other

Response: NTIA and RUS should continue to allow the capitalized lease provision as an eligible expense.¹ Furthermore, NTIA and RUS should actively encourage applicants to use existing communications infrastructure for delivery of services to unserved and underserved communities, rather than funding projects that would involve needless duplication of existing facilities. Attached hereto as Exhibit 1 is a copy of our letter dated June 11, 2009 respecting this issue.

Please feel free to call me if you have any questions.

Sincerely,

Paul Savill
Senior Vice President

Attachment

¹ "D. Eligible Cost Purposes; a. Eligible Infrastructure Award Expenses; ii. To fund the cost of leasing facilities required to provide broadband service if such lease qualifies as a capital lease under GAAP. Award funds may be used to fund the cost of the capital lease for no more than the first five years after the date of the first advance of award funds."